Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist

Facility:	Process(es) Covered:	Date:

VII. MANAGEMENT OF CHANGE (MOC) PROGRAM

A. PROCEDURE/POLICY REVIEW

1) EXISTENCE, STRUCTURE AND FORMAT OF MOC PROCEDURE	NAC Ref.	Resp. Code
Does the written MOC procedure satisfy CAPP requirements and do MOC records indicate that the reviews are being conducted pursuant to CAPP requirements? (all requirements of sections 2 through 4 must be met)	459.95423	

Notes/Comments Pertaining to Responses to Questions under Issue 1):

2) MOC PROCEDURAL REQUIREMENTS FOR EVALUATION AND AUTHORIZATION	NAC Ref.	Resp. Code
i. Does the MOC procedure define when it is to be used?	459.95423(1a)	
ii. Does the MOC procedure require that the technical basis for a proposed change be documented and reviewed?	459.95423(1b1)	
iii. Does the MOC procedure require documented review of the potential safety impacts caused by the proposed change?	459.95423(1b2)	
iv. Does the MOC procedure require documented review of the potential health impacts caused by the proposed change?	459.95423(1b2)	
v. Does the MOC procedure require documented review of the Standard Operating Procedures for potential impacts caused by the proposed change?	459.95423(1b3)	
vi. Does the MOC procedure require documented review of the Safe Work Practices (SWPs) for potential impacts caused by the proposed change?	459.95423(1b3)	
vii. Does the MOC procedure require the designation of the time period necessary to make the proposed change?	459.95423(1b4)	
viii. Does the MOC procedure designate parties responsible to authorize the scope, performance and completion of each of the elements noted in 'i' through 'vii' above?	459.95423(1b5)	

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ix.	Does the MOC procedure provide a mechanism to require that all authorizations be secured prior to implementation of the proposed change?	459.95423(1b5)	

Notes/Comments Pertaining to Responses to Questions under Issue 2):

3)	**MOC PROCEDURAL REQUIREMENTS FOR TRAINING AND DOCUMENTATION UPDATES**	**NAC Ref.**	**Resp. Code**
i.	Does the MOC procedure require verification that process operators and any maintenance or contract employee whose job tasks will be affected by the change **are informed** of proposed change prior to implementation? (This applies in circumstances where formal training and comprehension evaluation are not necessary.)	459.95423(1c)	
ii.	Does the MOC procedure require verification that process operators and any maintenance or contract employee whose job tasks will be affected by the change **are trained** in the proposed change prior to implementation? (This applies in circumstances where the duties of personnel are being changed, and verified comprehension of those changed duties are important.)	459.95423(1c)	
iii.	Does the MOC procedure require that the Process Safety Information (PSI) be updated as necessary?	459.95423(1d1)	
iv.	Does the MOC procedure require the S&H information, SOPs and SWPs be updated as necessary?	459.95423(1d2)	

Notes/Comments Pertaining to Responses to Questions under Issue 3):

4)	**VERIFICATION OF MOC IMPLEMENTATION**	**NAC Ref.**	**Resp. Code**
i.	Does the review of actual MOCs from Part B indicate that they are being completed pursuant to CAPP requirements?	459.95423(1)	
ii.	Has the MOC been applied when required? (Refer to Part B)	459.95423(1)	

Notes/Comments Pertaining to Responses to Questions under Issue 4):

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General Procedure/Policy Review Notes/Comments:

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B. ON-SITE INSPECTION - RECORDS AUDIT

1) REVIEW 2 TO 4 ISSUED MOCs AGAINST THOSE LISTED ON THE DATA FORM.

#	MOC ID #	Proposed Change	Issue Date	Approval Date	Implement Date
i					
ii					
iii					
iv					

Inquiry/Observation	Resp. Code:			
	i	ii	iii	iv
a. Is there documented evidence that the Technical Basis for the proposed change was defined and approved?				
b. Is there documented evidence that the proposed change was reviewed and approved for potential impacts on safety? (If there was a change to PSI, a PSSR must have been performed which would include a PHA)				
c. Is there documented evidence that the proposed change was reviewed and approved for potential impacts on employee health?				
d. Is there documented evidence that the Standard Operating Procedures were reviewed for potential impacts from the proposed change, and modified as necessary? Were the revisions approved?				
e. Is there documented evidence that the Safe Work Practices were reviewed for potential impacts from the proposed change, and modified as necessary? Were the revisions approved?				
f. Is there documented evidence that a timeframe was established for making the proposed change, and was the change implemented within that time?				
g. Is there documented evidence that updates to the Process Safety Information (PSI) were completed? (Formal revisions may be completed after the MOC implementation)				
h. Is there documented evidence that any identified changes or updates to the SOPs were completed? (Formal revisions may be completed after the MOC implementation)				
i. Is there documented evidence that any identified changes or updates to the SWPs were completed? (Formal revisions may be completed after the MOC implementation)				
j. Is there documented evidence that any operations, maintenance or contract employee that is affected by the change was informed prior to implementation of the change?				
k. Is there documented evidence that any operations, maintenance or contract employee that is affected by the change was trained prior to implementation of the change?				
l. Is there documented evidence that the components of the proposed change have been verified as being complete prior to implementation?				

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m. Based on the Response Codes used to complete items 'a' through 'l' above, is it possible to confirm that an MOC review was performed in accordance with program requirements (all Response Codes input were either Y or NA)?				VII-5

Notes/Comments Pertaining to Responses to Questions under Issue 1):

2) MOCs COMPLETED	**NAC Ref.**	**Resp. Code**
a. Have MOCs been completed for circumstances requiring such? (Answer is limited to auditor's observations and inquiries. List any activities for which an MOC was not conducted as required.)	459.95423(1)	

Notes/Comments Pertaining to Responses to Questions under Issue 2):

General On-Site Inspection Notes/Comments:

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C. INTERVIEWS

1) **SELECT TWO OR MORE OPERATING PERSONNEL TO INTERVIEW REGARDING THE EFFECTIVENESS OF THE MOC PROCEDURE USING THE FOLLOWING QUESTION SETS.**
(RESPONSES ARE TO BE LOGGED ON FOLLOWING PAGES.)

Question Set	Question Options/Phrasing
a	What is your job description and associated tasks?
b	Do you know what the MOC program is, and why it exists? How does the MOC process work?
c	What is the difference between a change and a replacement-in-kind? What are some examples of changes or replacements-in-kind that you may encounter?
d	How are you involved in the MOC process?
e	Have you ever been informed of changes made through the MOC process or received training in changes?
f	Is there any part of the MOC process that you would like to see improved?

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C. INTERVIEWS

2)   RECORD RESPONSES OF SELECTED OPERATING OR MAINTENANCE PERSONNEL TO QUESTIONS FROM THE QUESTION SETS   (LISTED ON THE FIRST PAGE OF SECTION C)

Employee Profile

Job Title/Position	Department/Unit/Group	Time in Job	Time w/Co.

Response to Question Set _:

Response to Question Set _:

Response to Question Set _:

Response to Question Set _: